

EXHIBIT A

2 of 2

1 going until after, like, 6:00 o'clock
2 with a deposition if all these phone
3 calls have had to do with Mr. Mizrahi not
4 doing what he was supposed to do.

5 Can we just state that we're not
6 going to go until 7:00 or 8:00 o'clock at
7 night or until such time that Mr. Mizrahi
8 thinks it's satisfactory?

9 It's seven hours and 5:30 is
10 actually seven hours. We're willing to
11 go until 6:00 to accommodate for a lunch
12 break of 30 minutes, but I think that's
13 all we should have to go.

14 Because -- this is unnecessary. I
15 agree. But, it's because Defense counsel
16 did something wrong and unnecessary.

17 MR. MIZRAHI: Your Honor, we've been
18 on the phone now and we've been on a
19 break now for a half an hour and for the
20 entirety of the deposition Mr. Leon has
21 been instructing and improperly guiding
22 his client. We're wasting so much time.

23 MR. LEON: He hasn't given one
24 example of how I did that. Not one. And
25 that's the most significant thing.

1 MR. MIZRAHI: He's now taken an hour
2 and a half of everybody's time.

3 MR. LEON: You made the first phone
4 call and it got denied, I made the second
5 phone call and now we're here because of
6 what you were doing. It's not my fault,
7 it's not my client's fault. He has been
8 on this since 10:30 and now it's 2:53,
9 Your Honor.

10 I would just ask that we end this at
11 5:30 or, at the latest, 6:00.

12 THE COURT: All right. Look, just
13 go to 6:00 and finish this up. No more
14 delays.

15 MR. MIZRAHI: Your Honor,
16 Plaintiff's counsel's going to continue
17 to delay this deposition. He's going to
18 continue to delay it.

19 MR. LEON: Your Honor, we have
20 not --

21 THE COURT: Excuse me. I don't know
22 what you expect me to do. I'm not in the
23 room. I don't know what he's saying or
24 how things are being delayed.

25 How, exactly, are you expecting me

1 to rule on this? I'm supposed to sit in
2 the room while you conduct a seven-hour
3 deposition because the two of you can't
4 act like professionals?

5 MR. MIZRAHI: No. Mr. Leon should
6 not put Your Honor on the spot for
7 setting time limits for depositions. He
8 should be a responsible adult and know
9 that he --

10 THE COURT: No. This is a
11 seven-hour deposition. You're the one
12 who might be asking for more time.

13 MR. MIZRAHI: I'd like to continue.

14 THE COURT: Continue the deposition.
15 If you can't finish by 6:00 o'clock, give
16 me a call. But this should not be so
17 hard.

18 MR. MIZRAHI: Thank you, Your Honor.

19 MR. LEON: Thank you, Your Honor.

20 (The call was concluded.)

21 MR. LEON: Okay. So, on the record,
22 before I call my client in, it's all
23 confirmed, Madam Court Reporter, you have
24 the host capabilities?

25 THE REPORTER: That's my

1 understanding from Mr. Zampella at the
2 office. Yes.

3 MR. ZAMPELLA: I'd like to confirm
4 that really quick, if we don't mind.

5 (Off-the-record discussion held.)

6 (Recess taken.)

7 MR. LEON: So, just to confirm, the
8 court reporter has confirmed that she
9 has, to the best of her understanding,
10 sole access of the hosting capabilities
11 of this application, certainly not
12 Mr. Mizrahi.

13 So, Counselor, please proceed with
14 asking my client questions.

15 BY MR. MIZRAHI:

16 Q. Carlos, how long did you rest during
17 the day in 2015?

18 MR. LEON: Objection to the form of
19 that question and to the extent that it
20 mischaracterizes prior testimony. You
21 may respond.

22 THE WITNESS: No.

23 Q. The question was, how long did he
24 rest during the day in 2015?

25 MR. LEON: Objection. That's not a

1 question, that's a statement. Wait for a
2 question to answer.

3 Q. Carlos, how long did you rest during
4 the day in 2015?

5 MR. LEON: Objection to the form of
6 that question and to the extent that it
7 mischaracterized prior testimony and it
8 assumes testimony and evidence that has
9 not been given in this deposition.

10 You may respond to that.

11 THE WITNESS: No.

12 Q. Carlos, how long did you rest during
13 the day in 2016?

14 MR. LEON: Objection to the form and
15 to the extent that it mischaracterizes
16 prior testimony and assumes evidence and
17 testimony that has not been given in this
18 deposition. You may respond.

19 THE WITNESS: No.

20 MR. MIZRAHI: Madam Reporter, we're
21 going to be marking Exhibit A.

22 (Defendant's Exhibit A, Complaint,
23 marked for identification as of this
24 date.)

25 MR. MIZRAHI: Carlos, please follow

1 along on your own computer screen on
2 Exhibit A that was previously shared with
3 you.

4 MR. LEON: Can I just confirm,
5 Counsel, that you're sharing your screen
6 right now and that I'm not having a vivid
7 imagination here?

8 MR. MIZRAHI: Yes. We're sharing
9 our screen.

10 MR. LEON: I'm sorry. What's the
11 question for my client?

12 Q. Carlos, please confirm when you've
13 pulled up Exhibit A.

14 A. Okay.

15 Q. Carlos, I'm showing you a complaint
16 that was filed on October 20th of 2017. Please
17 take a moment to familiarize yourself with this
18 document.

19 MR. LEON: I'd just like to clarify
20 now, you're sharing the screen so I can
21 only see one page. Are you asking my
22 client to flip through that shared
23 version or some version that you expect
24 him to have?

25 MR. MIZRAHI: The document that he

1 has pulled up himself. Don't even refer
2 to the shared screen. You don't even
3 need to refer to the shared screen.

4 THE WITNESS: I want to call my
5 daughter so she can access this letter,
6 because I can't.

7 MR. LEON: Go ahead. You can call
8 her.

9 We're back on the record, Shirley.

10 MS. SANCHEZ: Okay.

11 MR. MIZRAHI: If you can download
12 the exhibits, Shirley, through the chat
13 function. If you could just download the
14 exhibits. We're going to be following
15 along with Exhibit A right now.

16 MS. SANCHEZ: Yeah. I downloaded
17 them.

18 MR. MIZRAHI: So, we're going to be
19 using Exhibit A right now, the Federal
20 Complaint.

21 MR. LEON: And just to be clear,
22 that's a 14-page document.
23 Mr. Translator, you can translate it.
24 It's a 14-page document. That's what
25 Exhibit A is, right?

1 MR. MIZRAHI: Shirley, do you have
2 it pulled up?

3 MS. SANCHEZ: Yes.

4 Q. Carlos, I'm showing you a complaint
5 that was filed on October 20th, 2017. Please
6 take a moment to familiarize yourself with this
7 document.

8 A. I don't understand English.

9 Q. Do you recognize this document?

10 MR. LEON: Objection, asked and
11 answered. You may answer again.

12 THE WITNESS: Yes.

13 Q. What is that?

14 A. The Complaint.

15 Q. Does your name appear anywhere on
16 this document?

17 A. Yes.

18 Q. Did you read this complaint before
19 it was filed?

20 MR. LEON: Objection. You may
21 respond.

22 THE WITNESS: My attorney took care
23 of this.

24 Q. Carlos, did you read this complaint
25 before it was filed?

1 A. Along with my attorney. Yes.

2 Q. How many times did you read this
3 complaint before it was filed?

4 MR. LEON: Objection to the form of
5 the question and objection to the extent
6 that it mischaracterizes prior testimony.

7 You may respond, Mr. Patel.

8 THE WITNESS: No.

9 Q. Again, the question was, how many
10 times did you read this complaint before it was
11 filed?

12 MR. LEON: Objection, asked and
13 answered in several ways. You may
14 respond to this question that
15 mischaracterizes prior testimony one more
16 time.

17 THE WITNESS: From two to three
18 times.

19 Q. Did you have this complaint
20 translated from English to Spanish?

21 A. Yes.

22 Q. Who translated this document from
23 English to Spanish?

24 A. My attorney.

25 Q. Can you verify the contents in the

1 complaint for accuracy before it was filed with
2 the Court?

3 MR. LEON: Objection to the form of
4 the question. Confusing. You may
5 respond.

6 THE WITNESS: Yes.

7 Q. Is it possible that the information
8 contained in the Complaint is not accurate?

9 MR. LEON: Objection, calls for
10 speculation and perhaps even legal
11 speculation.

12 THE WITNESS: No.

13 Q. Are you familiar with the building
14 located at 95-13/17 Northern Boulevard, Jackson
15 Heights, New York 11317?

16 MR. LEON: Objection to the form of
17 that convoluted question. You may
18 respond to that question. We also take
19 issue with any representations that were
20 made that were inaccurate.

21 You may respond.

22 THE WITNESS: No, because that's the
23 address of the store.

24 Q. What is the store?

25 A. 99 cent.

1 Q. 99 cent store?

2 A. Yes.

3 Q. Mr. Chinchu, I'm going to direct you
4 to paragraph 2 of the Complaint. Can you
5 please ask your daughter to read paragraph 2 of
6 the Complaint?

7 Or actually, never mind. I can read
8 it to you in English and the interpreter can
9 translate it to you in Spanish.

10 Paragraph 2 of the Complaint says
11 that:

12 "The Defendant is an individual who
13 owns a residential building located at
14 95-13/17 Northern Boulevard."

15 Are you familiar with this building?

16 MR. LEON: Objection to the form of
17 the question. You may respond to that
18 question.

19 THE WITNESS: Yes.

20 Q. What is it?

21 MR. LEON: Objection to the form of
22 the question. You may respond.

23 THE WITNESS: It's the building, but
24 it's not the address.

25 Q. For the remainder of the deposition

1 I'll be referring to this property as "the
2 building."

3 MR. LEON: Which building?

4 Q. Carlos, what do you mean when you
5 say it's the incorrect address?

6 A. It's the store. Do you want me to
7 give you the correct address?

8 Q. Is the other address 32-56
9 96th Street?

10 A. That's one, but the other one isn't
11 correct.

12 Q. Okay. Have you ever performed work
13 at the building?

14 MR. LEON: Objection to the form of
15 the question. Ambiguous. You may
16 respond.

17 THE WITNESS: At which address?

18 Q. What is the address of the
19 residential building, Carlos?

20 MR. LEON: Objection to the form of
21 the question. You may respond.

22 THE WITNESS: 95-13.

23 Q. Carlos, what is the address of the
24 store?

25 MR. LEON: Objection to the form of

1 the question. Ambiguous. You may
2 respond.

3 THE WITNESS: Thee's two stores.
4 It's 95-15, 95-17.

5 Q. For the remainder of the deposition
6 I'll be referring to the address 95-13 as "the
7 building" and I will be referring to the
8 address of 95-15/17 as "the store."

9 MR. LEON: Objection to that unclear
10 attempt at a clarification.

11 Q. Have you ever performed any work at
12 the building located at 95-13?

13 MR. LEON: Same objection to form.
14 Ambiguous. You may respond.

15 THE WITNESS: Yes.

16 Q. And have you ever performed any work
17 at the store located at 95-15/17?

18 MR. LEON: Objection to the form of
19 the question. Confusing, unclear. You
20 may answer.

21 THE WITNESS: No.

22 Q. Carlos, do you know anybody named
23 Mr. John?

24 MR. LEON: Objection to the form.

25 THE WITNESS: Yes.

1 Q. Who is he?

2 A. The previous owner.

3 Q. The previous owner of what?

4 A. Of all the building.

5 Q. How did you and Mr. John meet?

6 MR. LEON: You may respond.

7 THE WITNESS: I was going by there,
8 they needed a worker, I approached, I
9 asked and they accepted me.

10 Q. Do you know when that was?

11 MR. LEON: Objection to the form of
12 the question. You may respond.

13 THE WITNESS: Like 28 years ago.

14 Q. I mean, what was the conversation
15 that you and Mr. John had?

16 MR. LEON: Objection to the form of
17 the question. You may respond.

18 THE WITNESS: The truth is, I don't
19 remember.

20 Q. You had a conversation with Mr. John
21 and then he hired you to work at the building;
22 is that correct?

23 A. Yes.

24 Q. Were you working for him at the
25 residential building or at the commercial

1 space?

2 MR. LEON: Objection to the form of
3 the question, confusing due to the lack
4 of clarification. You may respond.

5 THE WITNESS: I worked at the store.

6 Q. What kind of store was it?

7 A. Ceramics store.

8 Q. What kind of work did you do at the
9 ceramics store?

10 A. I would receive materials and
11 deliver materials.

12 Q. When did you start working there?

13 A. I don't remember.

14 Q. You said it was about 28 years ago;
15 is that correct?

16 A. Yes.

17 Q. And when did you stop working at the
18 store?

19 MR. LEON: You may respond.

20 THE WITNESS: 2011, more or less.

21 Q. Can you please describe your duties
22 and responsibilities at the store?

23 MR. LEON: Objection to the form of
24 that question. You may respond.

25 THE WITNESS: As I told you, I

1 worked at the building and also at the
2 store.

3 Q. Can you describe the duties and
4 responsibilities that you had at the store?

5 MR. LEON: Objection to the form of
6 the question. Objection, asked and
7 answered. You may respond.

8 THE WITNESS: I've already
9 responded, right?

10 MR. LEON: Respond again to his
11 question.

12 THE WITNESS: I would receive
13 materials and I would turn in materials,
14 everything regarding to bathrooms.

15 Q. Did you have any other duties and
16 responsibilities when you were working for
17 Mr. John?

18 A. At the building.

19 Q. What were your duties and
20 responsibilities at the building?

21 MR. LEON: Objection to the form of
22 the question. You may respond.

23 THE WITNESS: I would also go out
24 and do repairs.

25 Q. What kind of repairs would you do at

1 the building?

2 MR. LEON: Objection to the form of
3 the question. You may respond.

4 THE WITNESS: I would change the
5 packing for the plumbing, I would also do
6 cleaning, I would also paint, I would
7 also repair empty apartments. That's
8 what I did.

9 Q. What was your schedule at the tile
10 store?

11 A. From Monday to Saturday.

12 Q. What were your hours Monday through
13 Saturday?

14 MR. LEON: Objection to the form of
15 the question and to the extent that it
16 mischaracterizes testimony that was just
17 given. You may respond.

18 THE WITNESS: Monday to Friday from
19 7:00 to 5:00 and then Saturday, 7:00 to
20 1:00.

21 Q. What was your schedule when you were
22 working at the building?

23 MR. LEON: Objection to the form of
24 the question. Confusing, ambiguous. You
25 may respond to that question.

1 THE WITNESS: With John or with
2 Patel?

3 Q. Mr. John.

4 A. Can you repeat the question?

5 Q. What was your schedule when you were
6 performing work at the building for Mr. John?

7 A. I've already told you. From 7:00 to
8 5:00 Monday through Friday and Saturday 7:00 to
9 1:00.

10 Q. So, the work that you performed at
11 the tile store and the work that you performed
12 at the building shared the same schedule?

13 MR. LEON: Objection to the form of
14 the question.

15 THE WITNESS: Can I respond?

16 MR. LEON: Yes.

17 THE WITNESS: It was within the
18 schedule I worked at both places.

19 Q. Did you have any other managers
20 besides Mr. John?

21 MR. LEON: Objection to the extent
22 that it will -- first off, objection to
23 the form and objection to the extent that
24 it mischaracterizes prior testimony and
25 assumes evidence and testimony not

1 previously submitted here. But, you may
2 respond.

3 THE WITNESS: No.

4 Q. Where did you live during this time?

5 MR. LEON: Objection to the form of
6 the question.

7 THE WITNESS: Can you repeat the
8 question?

9 Q. When you were performing services at
10 the tile store, where did you live?

11 MR. LEON: Objection to the form of
12 the question. You may respond.

13 THE WITNESS: In Connecticut.

14 Q. Where in Connecticut were you
15 living?

16 MR. LEON: Objection to the form of
17 the question. You may respond where in
18 Connecticut you lived at that time.

19 THE WITNESS: I don't remember the
20 street, but -- I don't. I don't. I
21 didn't understand well.

22 Q. Where in Connecticut did you live
23 when you were working at the tile store?

24 MR. LEON: Objection. I just want
25 to make clear, my client can respond to

1 this question, but he is not to disclose
2 where he currently lives.

3 THE WITNESS: May I respond?

4 MR. LEON: Yes.

5 THE WITNESS: In Greenwich.

6 THE INTERPRETER: That's what the
7 interpreter is hearing.

8 Q. When did you move from Greenwich,
9 Connecticut?

10 MR. LEON: Objection to the form of
11 the question. You may respond to the
12 question.

13 THE WITNESS: When I went back to
14 Connecticut? When I moved to
15 Connecticut?

16 Q. When did you move from that address?

17 MR. LEON: Objection to the form of
18 the question. You may respond.

19 THE WITNESS: In what year?

20 Q. What year did you first move from
21 Connecticut?

22 MR. LEON: Objection to the form of
23 that question. You may respond.

24 THE WITNESS: The truth is, I don't
25 remember.

1 Q. Did you ever live at the building
2 when you were performing work for Mr. John?

3 A. The last two months.

4 Q. Will you please describe the
5 conversation you had with Mr. John when you
6 first started living at the building?

7 MR. LEON: Objection. Assumes facts
8 in evidence that has not been previously
9 admitted or alleged. You may respond to
10 that question (inaudible) something
11 inconsistent with your prior testimony.

12 THE WITNESS: I don't remember.

13 Q. What were you paid by Mr. John?

14 MR. LEON: Objection to the form of
15 the question. You may respond to that
16 question.

17 THE WITNESS: \$450 weekly.

18 Q. Did that amount ever change?

19 MR. LEON: Objection to the form of
20 the question. You may respond.

21 THE WITNESS: With John it did not
22 change.

23 Q. In addition to receiving that weekly
24 amount, you also mentioned that he gave you
25 room and board; is that correct?

1 MR. LEON: Objection,
2 mischaracterizing. You may respond.

3 THE WITNESS: Since the train was
4 expensive he said that I could stay
5 during the week.

6 Q. And do you know when that
7 arrangement started?

8 MR. LEON: Objection to the form of
9 the question. Confusing. You may
10 respond.

11 THE WITNESS: Two months before
12 Patel arrived.

13 Q. Where did you stay in the building?

14 MR. LEON: Objection to the form of
15 the question. You may respond to that
16 question.

17 THE WITNESS: In the basement.

18 Q. Do you recall when you first were
19 hired to work at the building for Mr. Patel?

20 A. I don't remember.

21 Q. I can refresh your recollection.

22 Paragraph 2 of the Complaint states that:

23 "Plaintiff worked for Defendant as a
24 superintendent and/or laborer at the building
25 from 2009."

1 So, is it true that you started
2 working at the building around 2009?

3 MR. LEON: Objection to the form of
4 that question. You may respond to that
5 question.

6 THE WITNESS: Yes. With Patel.

7 Q. Right. Started with Mr. Patel in
8 2009.

9 Did you and Mr. Patel have a
10 conversation when you were hired?

11 MR. LEON: Objection to the form of
12 the question. You may respond.

13 THE WITNESS: No.

14 Q. How did you and Mr. Patel meet?

15 A. The previous owner said I was a good
16 worker and he said that if he wanted he could
17 hire me.

18 Q. Did you and Mr. Patel ever speak
19 before you started working for him?

20 A. No.

21 Q. When did you first meet Mr. Patel?

22 A. When he came to the store.

23 Q. When did he first come to the store?

24 A. I don't remember.

25 Q. Did you first meet Mr. Patel before

1 January of 2009 or after January of 2009?

2 A. Before. Because, John had placed an
3 ad in the newspaper that it was for sale and he
4 came.

5 Q. Can you please tell me about the
6 first conversation that you first had with
7 Mr. Patel?

8 A. I only met him and that was it.

9 Q. What did you guys talk about?

10 MR. LEON: Objection to the form of
11 the question. You may respond.

12 THE WITNESS: I did not speak with
13 him.

14 Q. Where did this conversation take
15 place?

16 MR. LEON: Objection.
17 Mischaracterizing prior testimony. You
18 may respond.

19 THE WITNESS: I did not speak with
20 him.

21 Q. Is it your testimony here today that
22 you've never spoken with Mr. Patel before you
23 started working for him?

24 MR. LEON: Objection to the form of
25 the question. You may respond.

1 THE WITNESS: Can you repeat it?

2 Q. Is it your testimony here today that
3 you never spoke with Mr. Patel before you
4 started working for him?

5 A. No.

6 Q. Do you recall ever receiving an
7 agreement from Mr. Patel before you started
8 working?

9 A. No.

10 MR. MIZRAHI: Madam Court Reporter,
11 I'm going to be introducing another
12 exhibit into evidence. If you could
13 please mark what has been previously sent
14 to you as Defendant's Exhibit B for
15 identification.

16 (Defendant's Exhibit B,
17 Superintendent Responsibility, marked for
18 identification as of this date.)

19 MR. MIZRAHI: Mr. Chinchu, if you
20 could ask your daughter to assist you in
21 pulling up this document.

22 MS. SANCHEZ: Okay.

23 Q. Mr. Chinchu, I'm showing you a
24 document that has been Bates-stamped
25 Defendant's 0038 to Defendant's 0040. Please

1 take a moment to familiarize yourself with this
2 document.

3 MR. LEON: Jason, I'm looking at
4 this. Page 1 doesn't have a Bates stamp
5 on the bottom, unless I'm looking at it
6 wrong.

7 MR. MIZRAHI: The Bates stamp starts
8 at page 2. The title page doesn't have a
9 Bates stamp.

10 MR. LEON: No. I mean page 2.
11 Page 2. The one that follows the cover
12 page. It's cut off on the end and you
13 can't see a Bates stamp. I just want to
14 make sure that we're looking at the same
15 document. That's it.

16 MR. MIZRAHI: Well, you're looking
17 at the document marked "Superintendent
18 Responsibility"?

19 MR. LEON: Yes. But, I see no Bates
20 stamp on the bottom.

21 MR. MIZRAHI: Okay. It's the same
22 document.

23 MR. LEON: Okay. So, there's no
24 Bates stamp 38 here, just to be clear?
25 Because, there's no marking like that.

1 So, I want to make that clear for the
2 record.

3 Q. Please take a moment to familiarize
4 yourself with this document, Mr. Chinchu.

5 A. No, it's in English and, no, I
6 haven't seen it.

7 Q. Do you recognize this document?

8 MR. LEON: Objection. Asked and
9 answered.

10 THE WITNESS: I don't recognize it.

11 Q. Does your name appear anywhere on
12 this document?

13 MR. LEON: Objection to the form.
14 You may respond.

15 THE WITNESS: Yeah, but it's not
16 written well.

17 Q. And does Mr. Patel's name appear
18 anywhere on this document?

19 MR. LEON: Objection to the form.
20 You may answer.

21 THE WITNESS: Yes. I don't
22 understand English, but his name is
23 there.

24 Q. Carlos, when did you stop working at
25 the building?

1 MR. LEON: Just to be clear, when
2 did he leave the building is the
3 question, right?

4 MR. MIZRAHI: No. The question is
5 when --

6 Q. Carlos, when did you stop working at
7 the building?

8 A. In 2017.

9 Q. What were the circumstances
10 regarding the termination of your employment?

11 MR. LEON: Objection to the form of
12 the question, assumes facts and evidence
13 not admitted into this deposition. You
14 may, nevertheless, respond.

15 THE WITNESS: Well, he came like a
16 crazy man, he yelled, "You're worthless
17 and you're gonna leave," and that was it.

18 Q. Who are you referring to?

19 A. To Patel.

20 Q. When did this conversation take
21 place?

22 A. I don't remember the date, but it
23 was the last day of my employment with him.

24 Q. What did you say to him?

25 MR. LEON: Objection to the form of

1 the question. You may respond.

2 THE WITNESS: I asked him why.

3 Q. What did he say?

4 A. "Because you're useless to me."

5 Q. Was anybody else present during this
6 conversation?

7 A. No.

8 Q. Where did this conversation take
9 place?

10 A. In the basement.

11 Q. Carlos, did you ever keep a record
12 of your work schedule when you were working for
13 Mr. Patel?

14 MR. LEON: Objection to the form of
15 the question. You may respond.

16 THE WITNESS: Can you repeat the
17 question?

18 Q. Did you ever record your work
19 schedule while you were working for Mr. Patel?

20 MR. LEON: Objection to the form of
21 the question. You may respond to that
22 question.

23 THE WITNESS: No.

24 Q. Did you ever keep a record of the
25 work that you performed for Mr. Patel?

1 MR. LEON: Objection to the form of
2 the question. You may respond.

3 THE WITNESS: No.

4 Q. Did you ever perform work at the
5 building while you were working for Mr. Patel?

6 MR. LEON: Objection to the form of
7 the question.

8 THE WITNESS: Can you repeat the
9 question?

10 Q. Did you ever perform work at the
11 building while you were working for Mr. Patel?

12 MR. LEON: Same objection. You may
13 respond.

14 THE WITNESS: Yes.

15 Q. Did you ever work at the building on
16 Mondays?

17 MR. LEON: Objection to the form of
18 the question. You may respond.

19 THE WITNESS: I worked every day of
20 the week.

21 Q. What time did you start working on
22 Monday?

23 A. At 7:00 in the morning.

24 Q. Did you speak to Mr. Patel before
25 you started working?

1 MR. LEON: Objection to the form of
2 the question. You may respond.

3 THE WITNESS: No.

4 Q. Can you describe your mornings for
5 me?

6 MR. LEON: Objection to the form of
7 the question. You may respond to that
8 highly ambiguous question.

9 MR. MIZRAHI: I can rephrase it.

10 MR. LEON: Don't answer anything.
11 Wait for him to rephrase the question.

12 Q. Carlos, how did you start your
13 mornings?

14 MR. LEON: Objection to the form of
15 the question. You may respond to that
16 ambiguous question.

17 THE WITNESS: When?

18 Q. On Mondays.

19 MR. LEON: Objection. Same
20 objection. Even though that wasn't a
21 question, it was more of a statement, you
22 may respond.

23 THE WITNESS: I would check in the
24 apartments.

25 Q. Carlos, did you eat breakfast on

1 Monday mornings?

2 MR. LEON: Objection to the form of
3 the question. You may respond to that
4 question.

5 THE WITNESS: Yes. I would wake up
6 at 6:00 in the morning, have a sandwich
7 and drink some juice.

8 Q. Who prepared your breakfast?

9 MR. LEON: Objection to the form.
10 You may respond.

11 THE WITNESS: A sandwich and a
12 juice? I would prepare it.

13 Q. What time would you start breakfast?

14 MR. LEON: Objection to the form of
15 the question. You may respond to that
16 question.

17 THE WITNESS: At 6:00 in the
18 morning.

19 Q. What time would you wake up?

20 MR. LEON: Objection, asked and
21 answered.

22 THE WITNESS: At 6:00 in the
23 morning.

24 Q. And what time would you typically
25 start breakfast on Monday mornings?

1 MR. LEON: Okay, objection. He's
2 asked and answered this, he's not
3 answering it anymore. He already
4 answered the question two times. You're
5 not going for a third time.
6 It's meant to harass and agonize my
7 client. You've gotten the answer. I
8 don't know if it's that you don't like
9 it, but I'm directing him not to answer
10 because you got him to answer already.
11 He told you when he got up and he told
12 you when he makes his breakfast.

13 Q. Carlos, you said you woke up at
14 6:00 a.m. and you also said that you had
15 started breakfast at 6:00 a.m. You can't wake
16 up and eat breakfast at the same time.

17 So, I'd like you to clarify, what
18 time did you typically start breakfast on
19 Monday morning?

20 MR. LEON: I've already directed my
21 client not to respond. He's answered the
22 question. Just because you don't like
23 the answer doesn't mean he didn't answer.

24 Q. Carlos, what time would you
25 typically finish breakfast on Monday morning?

1 MR. LEON: Objection to the form of
2 the question.

3 THE WITNESS: 6:15, 6:30.

4 Q. What work did you do on Mondays?

5 MR. LEON: Objection to the form of
6 the question. You may respond.

7 THE WITNESS: I would go around the
8 building to see if it was clean.

9 Q. Did you perform any other work on
10 Mondays?

11 MR. LEON: Objection to the form of
12 the question. You may respond.

13 THE WITNESS: Normally I would work
14 inside the apartments.

15 Q. Please describe the work that you do
16 inside people's apartments.

17 MR. LEON: Same objection. You may
18 respond.

19 THE WITNESS: I've told you, I
20 changed the gaskets and old pipes.

21 Q. How long would it typically take for
22 you to change the gaskets and the old pipes?

23 MR. LEON: Objection to the form of
24 the question. You may answer.

25 THE WITNESS: Well, it would depend.

1 If I had the new one I could do it right
2 there and then, but if not I would have
3 to go to the hardware store.

4 Q. How long would it typically take for
5 you to go to the hardware store and then come
6 back and then fix -- change a gasket?

7 MR. LEON: Objection to the -- I
8 don't even know what to call it, but at
9 least a compound question. I'm directing
10 my client to respond.

11 THE WITNESS: The hardware store
12 opens at 8:00 in the morning.

13 Q. How long did it take for you to go
14 around the building to see if it was clean?

15 A. Between 15 and 20 minutes.

16 Q. Besides going around the building to
17 see if it was clean and changing gaskets, did
18 you perform any other work on Mondays?

19 MR. LEON: Objection to the form of
20 the question. You can answer.

21 THE WITNESS: Well, I would paint, I
22 would prepare walls, if there was no hot
23 water I would have to go down and check
24 the boiler and things like that.

25 Q. Besides painting, preparing walls

1 and checking the boiler, was there any other
2 work that you performed?

3 MR. LEON: Objection to the extent
4 that that question mischaracterizes prior
5 testimony. You may respond to that
6 question.

7 THE WITNESS: Well, I would have to
8 check the stairs to make sure there were
9 no obstructions so people would come down
10 in case of an emergency, I had to move
11 bikes, boxes, old stoves.

12 Q. Carlos, how long would it typically
13 take for you to paint?

14 MR. LEON: Objection to form of that
15 question, that ambiguous question. You
16 may respond.

17 THE WITNESS: Can you repeat the
18 question?

19 Q. How long would it typically take for
20 you to perform the painting services that you
21 described?

22 MR. LEON: Same objection. You may
23 respond.

24 THE WITNESS: Well, it would depend.
25 It would depend if it was all the

1 apartment, if it was only the living
2 room, the bedroom, the bathroom. I don't
3 know what you're asking.

4 Q. Did you paint every Monday?

5 A. No.

6 Q. How often would you paint?

7 MR. LEON: Objection. You may
8 respond.

9 THE WITNESS: Well, it would depend.
10 When the tenant would leave I would have
11 to prepare the wall, also take out the
12 trash, put up new Sheetrock, put the
13 tape, sand.

14 Q. How many times in a year would that
15 happen?

16 MR. LEON: Objection to the form of
17 that vague question. You may respond to
18 that question.

19 THE WITNESS: I don't remember it,
20 but it was many times.

21 Q. How many times did that occur in
22 2015?

23 MR. LEON: Objection to the form of
24 the question. You may respond to that
25 question.

1 THE WITNESS: I don't remember.

2 Q. Was it more than five or less than
3 five?

4 MR. LEON: Objection to the form of
5 the question. You may respond.

6 THE WITNESS: It was more.

7 Q. How long would it take for you to
8 check the boiler?

9 MR. LEON: Objection to the form of
10 that question. You may respond to that
11 question.

12 THE WITNESS: In the summer or the
13 winter?

14 Q. How long would it take for you to
15 check the boiler in the summer?

16 MR. LEON: Same objection.

17 THE WITNESS: Every day in the
18 winter and then I would have to get up
19 every hour and a half, because that
20 boiler was not functioning correctly.

21 Q. Carlos, in the summer how long did
22 it typically take for you to check the boiler?

23 MR. LEON: Objection to the form of
24 the question. You may respond.

25 THE WITNESS: It would be three or

1 four times during the day, because it
2 would turn off, and then there was no hot
3 water.

4 Q. How long would it take for you to
5 typically check it each time?

6 MR. LEON: Objection to the form.
7 You may respond.

8 THE WITNESS: Well, it would depend,
9 because sometimes I'd have to perform
10 general maintenance to the boiler.
11 There's soot in it. I had performed
12 maintenance, clean it. So it would take
13 a day a month. But, I checked it every
14 day.

15 Q. How many minutes did you spend
16 checking it every day?

17 MR. LEON: All right. Objection,
18 asked and answered. Mr. Chinchu, please
19 answer his question.

20 THE WITNESS: One hour.

21 Q. Did that time ever change?

22 MR. LEON: You may respond.

23 THE WITNESS: One hour every time I
24 went. And once a month it would be
25 maintenance and it was all day long.

1 MR. LEON: Jason, I need a
2 five-minute bathroom break. I've been
3 drinking a lot of water, keeping
4 hydrated.

5 MR. INTERPRETER: This is a quick
6 question from the interpreter. Did
7 somebody mention that we would be taking,
8 like, a half an hour break for lunch?

9 MR. LEON: We did that already.

10 MR. INTERPRETER: Okay.

11 THE WITNESS: Please get those drops
12 for my eyes, please.

13 MR. LEON: Okay. Mr. Chinchu, I'm
14 speaking to you through the translator.
15 Please have your daughter turn off the
16 video and the mic so that you can then do
17 what you need to do.

18 (Recess taken.)

19 BY MR. MIZRAHI:

20 Q. Carlos, how often would you have to
21 go to the store to purchase equipment?

22 MR. LEON: Objection to the form of
23 the question. You may respond to that
24 question.

25 THE WITNESS: Equipment? I did not

1 buy equipment.

2 Q. You mentioned you had to go to the
3 store to get some equipment, if you had to
4 change a gasket, for example.

5 MR. LEON: Objection to the form of
6 the question and to the extent that it
7 mischaracterizes prior testimony. You
8 may respond.

9 THE WITNESS: Replacements.

10 Q. How often would you have to go to
11 the store?

12 MR. LEON: Objection, asked and
13 answered. You may respond again.

14 THE WITNESS: It would depend on the
15 type of things, for example, if it was a
16 the water faucets or if it was a gasket,
17 since we didn't have any at the building.

18 Q. How long would it take for you to
19 prepare walls?

20 MR. LEON: Objection to the form of
21 the question. You may respond to that
22 question.

23 THE WITNESS: It depends. Which
24 walls?

25 Q. Typically how long would it take for

1 you to prepare a wall?

2 MR. LEON: Same objection, asked and
3 answered. You may respond again.

4 THE WITNESS: One day and a half.

5 Q. How many walls would you prepare in
6 a week?

7 MR. LEON: Same objection. You may
8 respond.

9 THE WITNESS: One full apartment
10 would take me, like, 15 days.

11 Q. This was only when a tenant would
12 leave; is that correct?

13 MR. LEON: Objection to the form of
14 the question. You make respond.

15 THE WITNESS: No.

16 Q. Did you ever take a break to eat
17 lunch?

18 MR. LEON: Objection to the form of
19 that ambiguous question. You may
20 respond.

21 THE WITNESS: Between 15 and
22 20 minutes.

23 Q. Who prepared your lunch?

24 MR. LEON: You may respond.

25 THE WITNESS: It would depend.

1 Sometimes sandwiches, other times I'd buy
2 Chinese food.

3 Q. What time would you typically start
4 lunch?

5 MR. LEON: Objection to the form of
6 the question. You may respond.

7 THE WITNESS: At 1:00 in the
8 afternoon.

9 Q. What time would you typically finish
10 lunch?

11 MR. LEON: Objection, asked and
12 answered.

13 THE WITNESS: 1:20, 1:30.

14 Q. Besides breakfast and lunch did you
15 take any other breaks during the day?

16 MR. LEON: Objection, as that
17 question mischaracterizes prior testimony
18 quite deliberately. Please respond to
19 that question, nevertheless.

20 THE WITNESS: No.

21 Q. What time would you stop working on
22 Mondays?

23 MR. LEON: Objection to the form of
24 the question. You may respond.

25 THE WITNESS: I never stopped

1 working.

2 Q. What time would you go to sleep on
3 Mondays?

4 MR. LEON: Objection to the form of
5 the question. You may answer.

6 THE WITNESS: 9:00 or 10:00 at
7 night, but I would be on the lookout for
8 any calls that they could make during the
9 night.

10 Q. Did you ever speak with Mr. Patel to
11 let him know when you would stop working?

12 MR. LEON: Objection to the form of
13 the question and to the extent that it
14 mischaracterizes testimony that was just
15 given literally seconds ago. You may
16 respond to that question.

17 THE WITNESS: I don't understand
18 you.

19 Q. When you stopped working did you
20 ever speak with Mr. Patel to let him know when
21 you stopped working?

22 MR. LEON: Objection to the form of
23 that question and to the extent that it
24 misconstrues prior testimony given only
25 seconds or minutes ago. You may respond.

1 THE WITNESS: Can you repeat the
2 question?

3 (Record read.)

4 MR. LEON: Same objection as before.
5 I'm not going to repeat it, but same
6 objections as before. You may respond.

7 THE WITNESS: No.

8 Q. Did you need permission from
9 Mr. Patel to leave the building?

10 MR. LEON: Objection to the form of
11 the question. You may respond to that
12 question.

13 THE WITNESS: Yes.

14 Q. What kind of permission did you
15 need?

16 MR. LEON: Objection, ambiguous.
17 You may respond.

18 THE WITNESS: Well, when I wanted to
19 visit my family and my daughter he
20 wouldn't want me to go.

21 Q. Did you ever tell Mr. Patel how many
22 hours you worked?

23 MR. LEON: Objection to the form of
24 that question. Ambiguous, open-ended.
25 You may respond.

1 THE WITNESS: Can you repeat the
2 question?

3 Q. Did you ever tell Mr. Patel how many
4 hours you worked?

5 MR. LEON: Objection to the form of
6 that question.

7 THE WITNESS: No.

8 Q. Did you ever work in the building on
9 Tuesdays?

10 A. Every day.

11 Q. What time did you start working on
12 Tuesdays?

13 MR. LEON: Objection, asked and
14 answered. You may respond again.

15 THE WITNESS: At 7:00 in the
16 morning.

17 Q. Did you speak with Mr. Patel to let
18 him know when you started working?

19 MR. LEON: Objection to the form of
20 the question, ambiguous and open-ended.
21 You may respond to the question.

22 THE WITNESS: No.

23 Q. Would you eat breakfast on Tuesdays?

24 A. Can you repeat the question?

25 Q. Would you eat breakfast on Tuesdays?

1 A. Normally, like, every day at 6:00 in
2 the morning.

3 Q. The schedule that you described
4 before, is that Monday through Friday?

5 MR. LEON: Objection to the form of
6 that question to the extent that it
7 attempts to or, in fact, misconstrues
8 prior testimony given in his deposition.
9 You may respond.

10 THE WITNESS: Can you repeat it,
11 please?

12 Q. Did your weekly schedule ever
13 change?

14 MR. LEON: Objection to the form of
15 that question. You may respond.

16 THE WITNESS: My work schedule is
17 Monday to Friday, 7:00 to 5:00 p.m. and
18 then Saturday and Sunday, 8:00 to 3:00.
19 After that I was on duty in my apartment
20 in case they called me and there was an
21 emergency.

22 Q. Did you ever work in the building on
23 Saturdays?

24 A. Always.

25 Q. What time did you start working on

1 Saturdays?

2 MR. LEON: Objection, asked and

3 answered. He just answered again.

4 Q. What time did you start working on

5 Saturdays?

6 MR. LEON: Objection, asked and

7 answered multiple times. Instructing my

8 client to answer the question one more

9 time.

10 THE WITNESS: At 8:00 in the

11 morning.

12 Q. Did you speak with Mr. Patel to let

13 him know when you started working on Saturdays?

14 MR. LEON: Objection to the form of

15 that question.

16 THE WITNESS: Patel would tell me I

17 had to be there every day.

18 Q. Did you speak to Mr. Patel to let

19 him know when you started working on Saturday

20 mornings?

21 MR. LEON: Objection, asked and

22 answered. You can respond one last time.

23 THE WITNESS: Can you repeat the

24 question?

25 Q. Did you speak with Mr. Patel before

1 you started working on Saturday mornings?

2 MR. LEON: Same objection.

3 THE WITNESS: No.

4 Q. Did you eat breakfast on Saturday
5 mornings?

6 MR. LEON: Okay. I'm sorry.

7 Objection. I'm going to put this on the
8 record, because he's already testified to
9 that point for every single day he's
10 already answered.

11 Last time I'm going to let you ask
12 that question and have him answer it,
13 because you're asking him the same
14 questions over and over.

15 THE WITNESS: As always, I would get
16 up at 6:00 in the morning and prepare my
17 breakfast.

18 Q. What time would you typically finish
19 breakfast on Saturdays?

20 A. 6:30, 7:00.

21 Q. Please describe the work that you
22 performed on Saturdays.

23 A. The same what I did all week, sir.

24 Q. Did you ever take a break to eat
25 lunch?

1 MR. LEON: Objection to the form of
2 the question and to the extent it's been
3 asked and answered. You may answer
4 again.

5 THE WITNESS: I did not take it.

6 Q. Did you ever eat lunch on Saturdays?

7 A. Yes. After 3:00.

8 Q. What time would you typically start
9 lunch?

10 MR. LEON: Objection to the form of
11 that question. That's ambiguous and
12 open-ended. You may respond.

13 THE WITNESS: Half an hour.

14 Q. What time would you typically start
15 lunch on Saturdays?

16 MR. LEON: Objection, asked and
17 answered less than a minute ago. You may
18 answer that one final time, Mr. Chinchu.

19 THE WITNESS: The same, at 3:00 in
20 the afternoon.

21 Q. Besides breakfast and lunch, did you
22 take any other breaks during the day on
23 Saturdays?

24 MR. LEON: Objection to the extent
25 that it mischaracterizes prior testimony

1 and to the form. You may answer.

2 THE WITNESS: No.

3 Q. Did you speak with Mr. Patel to let
4 him know when you stopped working on Saturdays?

5 MR. LEON: You may respond.

6 THE WITNESS: He would come at that
7 time, more or less, to pay me.

8 Q. Did you speak to Mr. Patel to let
9 him know when you stopped working on Saturdays?

10 A. No, not to stop. He would come and
11 check in.

12 Q. So, you never spoke with him to let
13 him know when you stopped working? I just want
14 to make sure the record's clear.

15 MR. LEON: Objection to the extent
16 that that question misconstrues prior
17 testimony and assumes evidence and
18 testimony not previously given in this
19 deposition. You may respond.

20 THE WITNESS: Can you repeat the
21 question?

22 Q. Did you ever speak to Mr. Patel to
23 let him know when you stopped working on
24 Saturdays?

25 MR. LEON: Objection to the form of

1 the question to the extent that it
2 misconstrues prior testimony and assumes
3 testimony in evidence not acknowledged or
4 given in this deposition. You may
5 respond.

6 THE WITNESS: I would not stop
7 working.

8 Q. You testified that you had the same
9 schedule on Sundays as you did on Saturdays; is
10 that correct?

11 A. Yes.

12 Q. Do you ever go to church on Sundays?

13 MR. LEON: Objection as to
14 relevance. Please respond.

15 THE WITNESS: No.

16 Q. Did you ever go to Connecticut on
17 Saturdays and Sundays?

18 MR. LEON: Objection to the form of
19 that question. You may respond.

20 THE WITNESS: No.

21 Q. Did you ever leave the building on
22 Saturdays?

23 MR. LEON: Objection to the form of
24 that question. You may respond.

25 THE WITNESS: Can you repeat it,

1 please?

2 Q. Did you ever leave the building on
3 Saturdays?

4 MR. LEON: Objection to the form of
5 that question. You may respond.

6 THE WITNESS: Only the surgery I
7 had, which was on a Saturday.

8 Q. Besides the surgery, would you ever
9 leave the building on Saturdays?

10 MR. LEON: Objection to the form of
11 that question. You may respond.

12 THE WITNESS: No.

13 Q. Did you ever leave the building on
14 Sundays?

15 MR. LEON: Same objection. You may
16 respond.

17 THE WITNESS: No.

18 Q. How many hours did you work the
19 first week of your employment?

20 MR. LEON: Objection to the form of
21 that question. You may respond to that
22 question.

23 THE WITNESS: I don't remember.

24 Q. How many hours did you work the
25 second week of your employment?

1 MR. LEON: Okay. Same objection.

2 He's going to respond, I'm going to

3 direct him to respond, but I'm going to

4 caution, if you're going to be going week

5 by week by week by week, that is

6 harassing him and I'm not going to allow

7 you to keep doing that. And if that

8 continues happening, I'm going to direct

9 him not to respond.

10 But, for now please respond to his
11 question, if you know.

12 THE WITNESS: I don't remember.

13 Q. Do you recall how many hours you
14 worked the third week of your employment?

15 MR. LEON: This is the last time.

16 I'm going to direct him to answer this
17 one. Let him speak --

18 MR. MIZRAHI: (Unintelligible.)

19 MR. LEON: No, no. I'm speaking for

20 myself to you, Jason. I know that's kind

21 of hard to comprehend sometimes. But,

22 I'm making an objection that this is the

23 last type of question he's going to

24 answer.

25 We're not going to go through a

1 hundred weeks of "Do you remember the
2 fourth week," "Do you remember the fifth
3 week," "Do you remember the sixth week,"
4 because that's what you're doing.
5 This third time I'll let him respond
6 and that's as far as that type of
7 question is going to go. Because, it's
8 harassing. There's no angle to it and
9 I'm not going to go more into it, because
10 then I'll be making a speaking objecting,
11 according to you.
12 So, please, Mr. Chinchu, respond to
13 his question, but please keep in mind
14 that, going forward, if he asks you more
15 questions like that, I'm going to direct
16 you not to answer. For now answer his
17 question. You may respond.

18 THE WITNESS: I work normally.

19 Q. Is it your testimony, under penalty
20 of perjury, that you worked over 40 hours every
21 week of your employment?

22 MR. LEON: Objection to the form of
23 that question. You may respond to that
24 question.

25 THE WITNESS: What does "perjury"

1 mean?

2 Q. It means that you're under oath.

3 MR. LEON: Objection,
4 misrepresentation. That's actually not
5 what it means.

6 Mr. Chinchu, you don't have to take
7 Mr. Mizrahi's representation of that word
8 to be fact. Just keep that in mind.

9 THE WITNESS: Can you repeat the
10 question?

11 Q. Is it your testimony that you worked
12 over 40 hours per week during your employment?

13 A. Yes.

14 Q. Have you ever suffered from any
15 disabilities?

16 MR. LEON: Objection to the form of
17 that question and to its relevance. I'll
18 allow it for now. You may respond.

19 THE WITNESS: No.

20 Q. You previously testified you had
21 some vision loss in 2015. Do you recall?

22 MR. LEON: Objection to the extent
23 that it mischaracterizes prior testimony.

24 You may respond, Mr. Chinchu.

25 THE WITNESS: Yes.

1 Q. Did this vision loss impact your
2 ability to perform any physical work?

3 MR. LEON: Objection to the form of
4 that question to the extent that it
5 contains mischaracterizing prior
6 testimony. You may respond.

7 THE WITNESS: After the surgery I
8 was fine.

9 Q. What about before the surgery?

10 MR. LEON: Objection to the form of
11 the question. You may respond.

12 THE WITNESS: I already told you, my
13 vision was low, I went to the doctor and
14 they performed the surgery.

15 Q. Before you had the surgery did it
16 impact your ability to perform physical work?

17 MR. LEON: Objection to the form of
18 that question. You may respond to that
19 question.

20 THE WITNESS: No.

21 Q. After you had the vision surgery
22 were you still able to paint the walls?

23 MR. LEON: Objection to the form of
24 the question. You may respond.

25 THE WITNESS: Yes.

1 Q. And after you had the vision surgery
2 were you able to prepare vacant apartments?

3 MR. LEON: Objection to the form of
4 the question as phrased. You may respond
5 to that question.

6 THE WITNESS: Yes.

7 Q. You previously testified that you
8 had another surgery in May of 2015. Do you
9 recall?

10 MR. LEON: You may respond.

11 THE WITNESS: Yes.

12 Q. And that was the surgery for a
13 pacemaker; is that correct?

14 A. Yes.

15 Q. And you previously testified that
16 you required that surgery because you couldn't
17 stand; is that correct?

18 MR. LEON: Objection to the form of
19 the question to the extent that it
20 mischaracterizes prior testimony. You
21 may respond.

22 THE WITNESS: As I said, it was only
23 one day that I could not walk.

24 Q. Have you ever applied for disability
25 benefits?

1 MR. LEON: Objection. Objection.
2 Pursuant to the countless objections that
3 I've made in this deposition with
4 Judge Tiscione, directing my client not
5 to respond to questions about government
6 benefits, disability benefits.

7 So, Mr. Chinchá, do not respond to
8 that question or that line of questions.

9 (Defendant's Exhibit C, Text Message
10 String, marked for identification as of
11 this date.)

12 Q. We're going to show you what's
13 previously been marked as Defendant's
14 Exhibit C. If you could take a moment to pull
15 up this exhibit.

16 Mr. Chinchá, can you have your
17 daughter open up Exhibit C for you?

18 A. Okay. She's going to open it.

19 MR. LEON: And just for the record,
20 Counsel, this is a three-page document,
21 correct, inclusive of cover page. That's
22 correct, Jason?

23 MR. MIZRAHI: Yes.

24 Q. Carlos, I'm showing you a document
25 that is Bates-stamped Defendant's 0056 to 0057.

1 Please take a moment to familiarize yourself
2 with this document.

3 A. It's in English. I don't read
4 English.

5 Q. If you could ask your daughter to
6 please scroll down to the last page of the
7 document.

8 MR. LEON: Shirley, you can hear
9 that, right?

10 MS. SANCHEZ: Yes. Yes.

11 MR. LEON: Okay. So, let's just go
12 to page 3 of that document.

13 MS. SANCHEZ: Okay.

14 MR. MIZRAHI: You can actually
15 scroll back to page 2, beginning with,
16 "Hey Patel this is Carlos Junior."

17 MS. SANCHEZ: Okay.

18 Q. Carlos, you previously testified
19 that you had a son; is that correct?

20 A. Yes.

21 Q. And what is your son's name?

22 A. Carlos Roger Chinchu.

23 Q. Do you recall your son Carlos ever
24 texting Mr. Patel?

25 A. The truth is, I don't know. I'm

1 recently seeing this document.

2 Q. Does your name appear anywhere on
3 this document?

4 MR. LEON: Objection to the form of
5 the question. You may respond.

6 THE WITNESS: My first name, Carlos
7 Junior.

8 Q. Carlos, I'm representing to you a
9 message was sent in this conversation by your
10 son. And the message reads:

11 "You can call who ever you want my
12 dad is old and disable."

13 It's on the last page, bracketed in
14 red.

15 MR. LEON: Objection. You do not
16 have to take Counsel's representation to
17 be accurate. And I object to the extent
18 that this question or any line of
19 questions will call you to speculate.

20 You may respond to any question that
21 he may eventually pose.

22 THE WITNESS: I can't respond to
23 this, because I've never seen it and he's
24 never told me about this.

25 Q. Well, you're reading it right now.

1 MR. LEON: Objection. He didn't say
2 he's reading, it's being translated to
3 him.

4 Carlos, Carlos, Carlos, Carlos.
5 There's no pending question. Wait until
6 he asks a question.

7 Q. Carlos, according to the
8 interpreter's translation, does your son refer
9 to you as old and disabled?

10 MR. LEON: Objection to the form of
11 that question. It's very difficult to
12 make sense out of that and calls for
13 speculation.

14 You may respond, Mr. Chinchu.

15 THE WITNESS: I have not seen this
16 document.

17 (Defendant's Exhibit D, Notice of
18 Eligibility Determination, marked for
19 identification as of this date.)

20 Q. I'd like to introduce what has
21 previously been marked as Defendant's Exhibit D
22 for identification.

23 MR. LEON: Mr. Chinchu, before --
24 I'm going to allow Mr. Mizrahi to go
25 ahead and do -- I'm not going to stop him

1 from asking a question, but I want to
2 just make one statement on the record
3 about this document.

4 I'm going to allow my client to
5 answer only a question in which he's
6 being asked to acknowledge whether he's
7 seen this document before or not,
8 otherwise it goes back to my prior
9 objections of the fact that you are not
10 permitted under Second Circuit case law
11 to ask question that would go to his
12 immigration status, such as his
13 application for any government benefits.

14 So, I'm directing you to wait until
15 Mr. Mizrahi asks his question and the
16 only question I'm going to allow you to
17 answer regarding that document is of
18 whether you've seen it before.

19 And before you open it up I just
20 want to remind my client to wait before
21 answering so we can ascertain whether I
22 have to direct him not to answer the next
23 question.

24 Q. Please pull up Exhibit D, Carlos.

25 A. So, I have to call my daughter.

1 MR. LEON: Shirley, can you open up
2 Exhibit D for your father?

3 MS. SANCHEZ: D? Okay. Hold on.
4 Okay.

5 Q. Carlos, I'm showing you a document
6 that's been Bates-stamped Defendant's 0004 to
7 0007. Please take a moment to familiarize
8 yourself with this document.

9 A. I've never seen it.

10 Q. Do you recognize this document?

11 MR. LEON: Objection, asked and
12 answered. You can answer it one more
13 time and I've already told you what my
14 position is on this. He just answered
15 your question.

16 Can we ask the court reporter just
17 to repeat back the question?

18 (Record read.)

19 MR. LEON: Objection. I'm giving
20 you the same instruction as before. You
21 are only to answer a question regarding
22 whether you've seen this document before
23 or not or recognize it, but you are not
24 to answer any other questions on it.

25 THE WITNESS: No.

1 Q. Have you ever applied for Protective
2 Services?

3 MR. LEON: No. Objection. I just
4 told you no. It's like you disregard and
5 ignore everything I say in this
6 deposition.

7 Before the translator even
8 translates I'm directing my client not to
9 respond and that will apply to any
10 follow-ups that you have of the sort.

11 Q. Carlos, I'd like to ask you some
12 questions about the work that you performed at
13 the building. I'd like to direct your
14 attention to paragraph 12 of the Complaint,
15 which is Exhibit A.

16 MR. LEON: Can you please ask
17 Mr. Chinchu to ask his daughter to open
18 up Exhibit A?

19 MS. SANCHEZ: Which one?

20 MR. LEON: Exhibit A.

21 MS. SANCHEZ: A?

22 MR. LEON: Yes. The Complaint.

23 MS. SANCHEZ: Where?

24 MR. LEON: Paragraph 12.

25 MS. SANCHEZ: Okay.

1 Q. Carlos, paragraph 12 lists some
2 duties and responsibilities when you were
3 employed at the building which, according to
4 the Complaint, the duties and responsibilities
5 consisted of collecting rent, performing
6 general maintenance duties, ensuring the
7 cleanliness of common areas, responding to
8 tenants' complaints and concerns, repairing
9 walls, painting walls, doors, ceilings,
10 installing and repairing cabinets, sinks and
11 other fixtures.

12 Besides what has been described in
13 paragraph 12, were there any other duties and
14 responsibilities?

15 MR. LEON: Objection to the extent
16 that Counsel appears to have
17 inadvertently, of course, inadvertently,
18 left out the last -- basically the last
19 two lines of that paragraph.

20 So, I'd ask to note that for the
21 record. I object on the basis that that
22 question --

23 MR. MIZRAHI: Let's withdraw the
24 question.

25 MR. LEON: Yeah. Let's do that.

1 Q. Carlos, what does "general
2 maintenance duty" mean?

3 MR. LEON: Objection to the form of
4 that question. You may respond.

5 THE WITNESS: Keep the building
6 clean, work on whatever inside the
7 building; when the light bulbs burn out,
8 just replace them. Everything inside the
9 building.

10 MR. LEON: Madam Court Reporter, I
11 want to make sure that you were able to
12 hear the translator about the last part
13 about everything inside the building. I
14 just want to make sure that that was
15 heard.

16 THE REPORTER: Yes. I got it.

17 MR. LEON: Thank you.

18 Q. How many minutes during the day did
19 you spend performing these general maintenance
20 duties?

21 MR. LEON: Objection to the form of
22 the question. Incredibly vague,
23 incomplete. You may respond to that
24 question.

25 THE WITNESS: Eight or ten hours.

1 Q. Is that per day?

2 A. Yes.

3 Q. What is a common area?

4 MR. LEON: Objection to the form of
5 that question. Calls for speculation,
6 possibly legal conclusions. You may
7 respond.

8 THE WITNESS: I don't understand
9 what the common area is.

10 Q. In your complaint you say that your
11 job consisted of ensuring the cleanliness of
12 common areas. What is a common area?

13 MR. LEON: Objection to the form of
14 that question to the extent that it
15 requires you to speculate about what your
16 attorney did. You may respond.

17 THE WITNESS: Well, repair locks,
18 change lights in and outside if they
19 burnt, make sure the door was locked,
20 because sometimes thieves would break
21 them to get in, so just make sure it was
22 locked.

23 Q. How many common areas are there in
24 the building?

25 MR. LEON: Same objection to the

1 form and to the extent that it calls for
2 my client to speculate. You may respond.

3 THE WITNESS: Can you repeat the
4 question?

5 Q. How many common areas are there in
6 the building?

7 MR. LEON: Objection to the form of
8 the question. You may respond to that
9 question.

10 THE WITNESS: There are three areas.

11 Q. What are the areas?

12 A. One entrance was the 95-13, the
13 other entrance was at 32-56 and another at the
14 rear or where the recycle was.

15 Q. Besides the three areas that you
16 described, were there any other common areas?

17 A. The roof. The roof was big.

18 Q. So then, how many common areas were
19 there in the building?

20 MR. LEON: Objection, asked and
21 answered. You may answer again.

22 THE WITNESS: Well, the roof, if you
23 didn't make sure the door was closed,
24 they would go up there and smoke.

25 Q. Did you work in the common areas

1 every day?

2 MR. LEON: Objection to the form of
3 the question. You may respond.

4 THE WITNESS: Every day.

5 Q. And according to the Complaint, you
6 ensured the cleanliness of the common areas; is
7 that correct?

8 MR. LEON: Objection to the form of
9 the question. My client's already
10 indicated that he can't read English.

11 You're asking him questions about
12 something that's in English after he's
13 explained to you that he cannot read it.
14 I'd like to make that objection.

15 To the best of your ability, sir,
16 respond to that question.

17 THE WITNESS: Can you repeat the
18 question?

19 Q. I'm representing to you that the
20 Complaint that you filed says that you ensured
21 the cleanliness of the common areas of the
22 building.

23 MR. LEON: Objection. You don't
24 have to accept Counsel's representation
25 to be fact. And wait for a question from

1 Mr. Mizrahi.

2 THE WITNESS: Repeat the question.

3 MR. LEON: There was no question.

4 Q. How long did you spend each day
5 ensuring the cleanliness of the common areas of
6 the building?

7 A. All day. All day I would have to
8 check these areas, because Patel would come and
9 then start to yell.

10 Q. How many hours did you spend
11 ensuring the cleanliness of the common areas?

12 MR. LEON: Objection to the form of
13 the question. You may respond to that
14 question.

15 THE WITNESS: Every two hours I
16 would go around and then I would go
17 upstairs and make sure if it was dirty or
18 something.

19 Q. How many hours total each day did
20 you spend ensuring the cleanliness of the
21 common areas?

22 MR. LEON: Objection to the form of
23 the question. You may respond to that
24 question.

25 THE WITNESS: Like four hours.

1 Q. How many tenants were in the
2 building in 2015?

3 MR. LEON: Objection to the form of
4 that question and to the extent that it
5 would cause my client to have to
6 speculate. You may respond if you know.

7 THE WITNESS: Can you repeat the
8 question?

9 MR. LEON: And the objection,
10 please.

11 (Record read.)

12 THE WITNESS: The building was full.

13 Q. Do you know how many tenants were in
14 the building in 2015?

15 MR. LEON: Objection, speculation.
16 You may respond.

17 THE WITNESS: Twenty-eight
18 apartments.

19 Q. Do you recall how many tenants were
20 in the building in 2016?

21 A. The same.

22 Q. And in 2017?

23 A. Until I left it was still the same.

24 Q. Are these one-bedroom apartments?

25 A. One- and two-bedrooms.

1 Q. Do you know approximately how many
2 of these 28 apartments were one-bedroom
3 apartments?

4 MR. LEON: Objection, relevance.
5 You may respond.

6 THE WITNESS: Fourteen/fourteen.

7 Q. How often did you get a tenant
8 complaint?

9 MR. LEON: Objection to the form of
10 the question. Ambiguous. You may
11 respond.

12 THE WITNESS: I can't tell you, but
13 it was all day and at night, as well.

14 Q. How many complaints did you
15 typically receive in one day?

16 MR. LEON: Objection, asked and
17 answered.

18 THE WITNESS: I don't remember, but
19 it was every day.

20 Q. Was it more than five complaints a
21 day or was it less than five complaints a day?

22 MR. LEON: Objection, answered
23 before. You may respond.

24 THE WITNESS: It was more.

25 Q. Was it more than ten complaints per

1 day or was it less than ten complaints a day?

2 MR. LEON: Objection to the form.

3 You may respond.

4 THE WITNESS: It would depend. It
5 would depend, because there was more
6 during the winter.

7 Q. In the summer would you typically
8 receive more than ten complaints per day or
9 less than ten complaints per day?

10 MR. LEON: Objection to the form of
11 the question. You may respond.

12 THE WITNESS: It was less.

13 Q. And during the other times of the
14 year, was it more than ten complaints per day
15 or less than ten complaints per day?

16 MR. LEON: Objection to the form of
17 the question. You may respond to that
18 question.

19 THE WITNESS: Can you repeat it?

20 Q. During the other times of the year
21 was it less than ten times per day or more than
22 ten times per day?

23 MR. LEON: Objection to the form of
24 that question. You may respond to that
25 question.

1 THE WITNESS: Well, it would depend.
2 It would depend. It was more during the
3 winter and in summer it was less.

4 Q. How long would it typically take for
5 you to respond to a tenant complaint?

6 MR. LEON: Objection to the form of
7 that question. You may respond.

8 THE WITNESS: Five minutes and then
9 I would go up to the apartment.

10 Q. What apartment?

11 MR. LEON: Objection to the form of
12 that question to the extent that it
13 misconstrues the prior testimony. You
14 may respond.

15 THE WITNESS: Apartment D6, D7, D8.

16 Q. I'm sorry. Can you clarify?

17 MR. LEON: Objection. That's not an
18 actual question. "Can you clarify" what?

19 Q. Go ahead, Carlos.

20 MR. LEON: Not "Go ahead, Carlos."
21 Please clarify, otherwise there's no
22 question to answer.

23 Q. Can you please clarify your
24 response? I don't understand it.

25 MR. LEON: Objection to the form of

1 the question. You may respond to that
2 question, Mr. Chinchu.

3 THE WITNESS: Can you repeat it?

4 MR. MIZRAHI: I'm going to withdraw
5 the question.

6 Q. How many walls did you repair in
7 2015?

8 MR. LEON: Objection to the form of
9 the question. You may respond to that
10 question.

11 THE WITNESS: I don't remember a
12 lot.

13 Q. Did you repair a wall every single
14 day in 2015?

15 A. No.

16 Q. Did you repair a wall every single
17 day in 2016?

18 A. No.

19 Q. Did you repair a wall every single
20 day in 2017?

21 A. No.

22 Q. Do you recall how many walls you did
23 repair in 2016?

24 MR. LEON: Objection to the form of
25 the question. You may respond to that

1 question.

2 THE WITNESS: I don't remember.

3 Q. Do you recall how many walls you
4 repaired in 2017?

5 MR. LEON: Objection to the form of
6 the question. You may respond.

7 THE INTERPRETER: Sorry. He was, I
8 believe, responding when you made the
9 objection.

10 THE WITNESS: I don't remember.

11 Q. How long would it typically take for
12 you to repair a wall?

13 MR. LEON: Objection. I believe
14 that's asked and answered, but you may
15 respond again.

16 THE WITNESS: I told you, two days.

17 Q. How many hours would it take for you
18 to repair a wall?

19 MR. LEON: Objection to the form of
20 that question. You may respond.

21 THE WITNESS: Well, it would depend.
22 It was taking the old one out, putting in
23 the new one, taping, painting, repairing,
24 then repairing the corners and then
25 painting.

1 Q. Carlos, how many painting jobs did
2 you do in 2015?

3 MR. LEON: Objection to the form of
4 that question. You may respond to that
5 question by Counsel, Mr. Chinchu.

6 THE WITNESS: I don't remember.

7 Q. What about 2016?

8 MR. LEON: Objection to the form.
9 You may respond.

10 THE WITNESS: I don't remember.

11 Q. What about in 2017?

12 MR. LEON: Same objection. You may
13 respond.

14 THE WITNESS: I don't remember.

15 Q. Were you painting every single day
16 in 2015?

17 MR. LEON: Objection. I believe
18 this is -- no, not believe. This is
19 definitely asked and answered. You may
20 respond to that question one more time.

21 THE WITNESS: Not every day, only
22 when there were problems on the wall.

23 Q. So, but, you only painted whenever
24 you were repairing the wall; is that correct?

25 MR. LEON: Objection to the extent

1 that it mischaracterizes prior testimony.

2 You may respond.

3 THE WITNESS: Sometimes there was a
4 broken pipe inside the wall, so we would
5 have to break the wall and repair it and
6 then do it again.

7 Q. How many times did you spend,
8 typically, installing cabinets?

9 MR. LEON: Objection to the form of
10 the question. You may respond to that
11 question.

12 THE WITNESS: I don't remember.

13 Q. How many cabinets did you install in
14 2015?

15 MR. LEON: Objection to the form and
16 to the extent that it would require my
17 client to speculate. Please respond to
18 the question.

19 THE WITNESS: One.

20 Q. How many cabinets did you install in
21 2016?

22 MR. LEON: Objection to the form of
23 the question and to the extent that it
24 would force my client to speculate.
25 Please respond to the question.

1 THE WITNESS: I don't remember.

2 Q. How many cabinets did you install in
3 2017?

4 MR. LEON: Same objection to the
5 form and to the extent that it would
6 require my client to speculate. You may
7 answer the question.

8 THE WITNESS: Nothing.

9 Q. Carlos, how long would it typically
10 take for you to repair a cabinet?

11 MR. LEON: Objection to the form of
12 the question. You may respond.

13 THE WITNESS: I did not repair a
14 cabinet, the cabinet was new.

15 Q. Did you ever repair any cabinets?

16 MR. LEON: Objection, asked and
17 answered. You may answer again.

18 THE WITNESS: No.

19 Q. How many sinks did you install in
20 2015?

21 MR. LEON: Objection to the form of
22 the question. You may respond.

23 THE WITNESS: I don't remember.

24 Q. Do you recall, how many sinks did
25 you install in 2017?

1 MR. LEON: Objection to the form of
2 the question. You may respond to that
3 question, Mr. Chinchu.

4 THE WITNESS: I don't remember.

5 Q. What about 2016?

6 A. Same objection. You may respond.

7 THE WITNESS: I don't remember.

8 Q. Would you install a sink every day
9 in 2015?

10 MR. LEON: Objection to the form of
11 the question. You may respond.

12 THE WITNESS: No.

13 Q. Was this something that you did
14 frequently or rarely?

15 MR. LEON: Objection to the form of
16 that question as phrased. You may
17 respond.

18 THE WITNESS: No.

19 Q. Was it frequent or was it very rare?

20 MR. LEON: Objection to the form of
21 the question. You may respond to the
22 best of your ability.

23 THE WITNESS: No.

24 Q. What kind of electrical work did you
25 do every day?

1 MR. LEON: Objection to the form of
2 that question and to the extent that it
3 mischaracterizes prior testimony and
4 assumes testimony in evidence not
5 admitted in this deposition. You may
6 respond to the question.

7 MR. MIZRAHI: Actually, we can
8 strike the question, I'm going to
9 withdraw it.

10 Q. How much time did you spend every
11 day performing electrical work?

12 MR. LEON: Objection to the form of
13 the question. You may respond to that
14 question.

15 THE WITNESS: It would depend on the
16 type of work I had to do there.

17 Q. Typically how much time do you spend
18 every day performing electrical work?

19 MR. LEON: Objection to the form of
20 that question, which is asking him about
21 the present tense. You may respond.

22 THE WITNESS: Not always.

23 Q. What was your compensation when you
24 were working for Mr. Patel?

25 MR. LEON: Objection to the form of

1 the question. You may respond.

2 THE WITNESS: What type of
3 compensation?

4 Q. What kind of compensation did you
5 receive?

6 A. None.

7 Q. Did you receive a weekly salary?

8 A. Yes.

9 Q. What was your weekly salary?

10 A. \$300.

11 Q. And did you also receive anything
12 else in addition to your weekly salary?

13 MR. LEON: Objection to the form of
14 the question. You may respond.

15 THE WITNESS: No.

16 Q. According to paragraph 14 of the
17 Complaint you allege that:

18 "In addition to his salary, the
19 Company provided him with a rent-free apartment
20 with an estimated rental value of \$1500 per
21 month."

22 MR. LEON: Objection to the extent
23 that that question is reading off of a
24 document that my client cannot read.
25 Please respond to the question.

1 Q. So, Carlos, did you receive a
2 rent-free apartment?

3 A. Yes.

4 Q. Did you ever pay for utilities for
5 this apartment?

6 MR. LEON: Objection to the form of
7 the question. You may respond.

8 THE WITNESS: No.

9 Q. Did you ever have to pay for
10 electricity for the apartment?

11 MR. LEON: You may answer.

12 THE WITNESS: No.

13 Q. You previously testified that during
14 the week you finished work typically at
15 5:00 p.m. Do you recall that?

16 MR. LEON: Objection to the form of
17 the question and to the extent that it
18 clearly mischaracterizes prior testimony.
19 You may respond.

20 THE WITNESS: Could you repeat the
21 question?

22 MR. MIZRAHI: I'm going to withdraw
23 the question.

24 MR. LEON: Just one quick thing.
25 Sorry to interrupt you. I'm really not

1 trying to interrupt you.

2 So, it's about 5:35, I know the
3 Judge said we'd go until 6:00. I, like
4 you, want to do some quick redirect at
5 the end, so I just want to put you on
6 notice that I want to add some follow-up
7 questions at the very end of the
8 deposition.

9 So, hopefully -- I mean, you do what
10 you want to do. If it goes until 6:00
11 and I haven't had a chance to do it, I'm
12 going to do it at that time. So, I'm
13 just letting you know.

14 MR. MIZRAHI: You know, I'm almost
15 finished.

16 MR. LEON: Yeah, yeah. I'm
17 literally not trying to be difficult.
18 I'm just telling you so that we can work
19 together.

20 THE INTERPRETER: And I just have a
21 quick request. This is the interpreter.
22 Can we take a quick comfort break?

23 MR. MIZRAHI: We can. We can add it
24 to the same time that we had before. I
25 know that there was a 30-minute break,

1 basically, to --

2 MR. LEON: Well, Jason, we're not
3 requesting this. I think it's a
4 courtesy --

5 MR. MIZRAHI: -- we're just going to
6 add it on top of all the other breaks.
7 So, right now we're scheduled to end at
8 7:15 p.m., according to my --

9 MR. LEON: Jason, do you have a hard
10 time understanding the Judge's orders, I
11 mean, like, throughout this lawsuit and
12 throughout this deposition?

13 He said end at 6:00. That's what he
14 said. So, I don't know where you're
15 getting the 7:15 from. You might be
16 saying that just to say it, and that's
17 fine, say whatever you want, but the
18 Judge said 6:00, which is why I'm
19 bringing --

20 Jason, Jason, Jason, I'm not done.
21 Stop wasting time.

22 I'm telling you right now it's 5:35
23 and I brought it up as a courtesy because
24 I want to do a redirect of my client,
25 most likely, and I was letting you know

1 so we can end by 6:00, as the Judge said.

2 I'm okay with the translator taking
3 five minutes or a comfort break. I mean,
4 it's a courtesy. But, don't make us pay
5 for it, Jason.

6 MR. MIZRAHI: I think we're -- we'd
7 like to just move forward. I'm not going
8 to be much longer.

9 MR. LEON: Okay.

10 Q. Carlos, did you ever return to your
11 apartment in the middle of the day?

12 MR. LEON: Objection to the form of
13 that question. You may respond as
14 phrased.

15 THE WITNESS: Only to pick up my
16 lunch.

17 Q. Did you ever go back to your
18 apartment in the middle of the workday for any
19 other reason?

20 A. Tools. For tools.

21 Q. Besides going back to your apartment
22 for tools and for lunch, did you go back to
23 your apartment for any other reason?

24 MR. LEON: Objection to the form of
25 the question as phrased. You may

1 respond.

2 THE WITNESS: No.

3 Q. What did you do after work?

4 MR. LEON: Objection to the form of
5 that question and to the extent that it
6 assumes testimony not given in this
7 deposition. You may respond to that
8 question.

9 THE WITNESS: My work was never
10 over. I would have to be on the lookout
11 for calls, emergency calls they would
12 make or something going on in the
13 building.

14 Q. You previously testified that you
15 worked from 7:00 a.m. to 5:00 p.m. Monday
16 through Friday. Do you recall that?

17 MR. LEON: You may answer.

18 THE WITNESS: Can you repeat the
19 question?

20 Q. You previously testified that you
21 worked Monday through Friday, 7:00 a.m. to
22 5:00 p.m.?

23 A. Yes.

24 Q. What did you typically do after
25 5:00 p.m.?

1 MR. LEON: Objection to the form of
2 the question. You may respond to that
3 question.

4 THE WITNESS: I would continue
5 working, again, for emergencies or calls
6 I got from the building.

7 Q. And did you stay in the building or
8 did you go outside the building?

9 MR. LEON: Objection to the form of
10 that question. You may respond to that
11 question, Mr. Chinchu.

12 THE WITNESS: I would stay inside
13 the building.

14 Q. Did you ever leave the building in
15 2015?

16 MR. LEON: Objection. This was
17 asked and answered in various ways
18 throughout this deposition. You may
19 respond again.

20 THE WITNESS: Only for my surgery.

21 Q. Did you ever leave the building in
22 2016?

23 MR. LEON: Same objection, asked and
24 answered various ways before. You may
25 respond to the question.

1 THE WITNESS: No.

2 Q. Did you ever leave the building in
3 2017?

4 MR. LEON: Objection to the form of
5 that question. Same thing. It's been
6 asked and answered in various ways. You
7 may answer that question again for
8 Mr. Mizrahi.

9 THE WITNESS: No.

10 Q. Did Mr. Patel ever tell you that you
11 were prohibited from leaving the building?

12 MR. LEON: Objection to the form of
13 the question. You may respond.

14 THE WITNESS: Always.

15 Q. When you were hired were you given a
16 daily schedule?

17 MR. LEON: Objection to the form of
18 that question as phrased by Counsel. You
19 may respond to that question.

20 THE WITNESS: No. He told me that I
21 can leave.

22 Q. When you were hired were you given a
23 daily schedule?

24 MR. LEON: Objection. Same
25 objection to the form of the question as

1 phrased by Counsel. Mr. Chinchu, you may
2 respond to Counsel's question yet again.

3 THE WITNESS: Can you repeat it,
4 please?

5 MR. MIZRAHI: You can withdraw the
6 question.

7 Q. Were you allowed to go to the doctor
8 if you needed to go to the doctor?

9 MR. LEON: You may respond.

10 THE WITNESS: Only one time.

11 Q. If you needed to go visit your
12 family in Connecticut, were you allowed to go
13 visit your family in Connecticut?

14 MR. LEON: Objection to the form of
15 the question. You may respond.

16 THE WITNESS: No.

17 Q. How many bedrooms was the apartment
18 that you were given in the building?

19 MR. LEON: Objection to the form of
20 the question. You may respond to that
21 question.

22 THE WITNESS: Can you repeat it?

23 Q. How many bedrooms was the apartment
24 in the building that you were given?

25 MR. LEON: Objection to the form of

1 the question. You may respond to that
2 question.

3 THE WITNESS: Two. I had the living
4 room and bedroom.

5 Q. Where did your wife live while you
6 were working at the building?

7 MR. LEON: Objection to the form of
8 that question and objection as to
9 relevance. I'm directing my client to
10 respond so long as there's an actual
11 basis to make that question.

12 You may respond to Counsel's
13 question.

14 THE WITNESS: In Connecticut.

15 Q. Did you ever go visit your wife in
16 Connecticut in 2015?

17 MR. LEON: Objection to the form of
18 that question. You may respond to that
19 question.

20 THE WITNESS: No.

21 Q. Where did your daughter live while
22 you were working in the building? I'm going to
23 withdraw that question.

24 Did you ever visit your wife in
25 Connecticut while you were working in the

1 building in 2016?

2 A. I was separated from her.

3 Q. Did you ever visit your wife while
4 you were working in 2016?

5 MR. LEON: Objection, asked and
6 answered. You may respond again.

7 THE WITNESS: I was separated from
8 her.

9 Q. I understand that you were
10 separated, but my question was if you ever
11 visited her in 2016.

12 MR. LEON: Objection to the form of
13 that question. Mr. Chinchu, you may
14 respond to that question posed by
15 Counsel.

16 THE WITNESS: Can you repeat the
17 question?

18 (Record read.)

19 MR. LEON: I'm sorry. Wait. The
20 question was if he went to visit her in
21 Connecticut, correct? That was the
22 question? Not if he saw her, but if he
23 went to visit her in Connecticut? That
24 was the question, correct? Jason, it's
25 your question. If you want it answered,

1 I would --

2 MR. MIZRAHI: Madam Reporter, could
3 you please read back the last question?

4 (Record read.)

5 MR. LEON: Objection. You may
6 respond.

7 THE WITNESS: No.

8 Q. How about 2017?

9 MR. LEON: Same objection. You may
10 respond to the question that Counsel has
11 asked you.

12 THE WITNESS: No.

13 Q. Where did your daughter live while
14 you were working at the building?

15 MR. LEON: Jason, wasn't this the
16 question that you withdrew, the literal
17 question that you withdrew, like, three
18 minutes ago?

19 MR. MIZRAHI: I'm asking the
20 question.

21 Q. Where did your daughter live while
22 you were working at the building?

23 MR. LEON: Objection to the form of
24 the question. You may respond to the
25 best of your ability.

1 THE WITNESS: With her husband.

2 Q. Where did they live?

3 MR. LEON: Objection. Objection.

4 Objection. There is no relevance to this

5 whatsoever. They testified about this

6 stuff. You have no business asking where

7 his ex or current partner lives.

8 I'm objecting, I'm directing him not

9 to respond. Those are inappropriate

10 lines of questions with absolutely no

11 chance of having any relevance. Do not

12 respond.

13 Q. And Carlos, did you ever visit your
14 daughter in 2015?

15 MR. LEON: Objection to the form of
16 the question.

17 THE WITNESS: Only while they
18 performed the surgery.

19 Q. Did you ever visit your daughter
20 while you were working in 2016?

21 MR. LEON: Objection to the form of
22 the question. You may respond.

23 MR. LEON: No.

24 Q. Did you ever visit your daughter
25 while you were working in 2017?

1 MR. LEON: Objection to the form of
2 the question. You may respond.

3 THE WITNESS: No, but she would
4 visit me.

5 Q. How often would she visit you?

6 MR. LEON: Objection to the form of
7 the question. You may respond.

8 THE WITNESS: Every two months.

9 Q. Where did your sons live while you
10 were working in the building?

11 MR. LEON: Objection to the form of
12 that question. You may respond to that
13 question that Counsel just asked.

14 THE WITNESS: During what time?

15 Q. Where did your sons live in 2015?

16 MR. LEON: Objection to the form of
17 the question and to the extent that it
18 would cause my client to speculate.
19 Nevertheless, you may respond to
20 Mr. Mizrahi's question.

21 THE WITNESS: Well, one lived in --
22 what's the name? One lived by Florida
23 and the other lived by Hollywood.

24 Q. Did you ever visit your sons while
25 you were working in 2015?

1 MR. LEON: Objection to the form of
2 the question. You may respond.

3 THE WITNESS: No.

4 Q. Did you ever visit your sons while
5 you were working in the building in 2016?

6 MR. LEON: Objection to the form of
7 the question. You may respond.

8 THE WITNESS: No.

9 Q. Did you ever visit your sons while
10 you were working in the building in 2017?

11 MR. LEON: Objection to the form of
12 the question. You may respond.

13 THE WITNESS: My youngest son came
14 with me because he also separated from
15 his wife.

16 MR. LEON: Jason, we're at eight
17 minutes to 6:00, so your part's going to
18 go until 6:00 p.m., pursuant to what the
19 Judge said, and then I will do very, very
20 quick, limited redirect, not 40 or
21 50 minutes of leading questions, I'll do
22 that and the deposition should be wrapped
23 up.

24 MR. MIZRAHI: And we can call the
25 Judge at 6:00.

1 THE INTERPRETER: I'm sorry, but I
2 really need a comfort break.

3 MR. MIZRAHI: Dean, you can go
4 ahead. We'll take a short break, just
5 come back whenever you're ready.

6 MR. LEON: Sorry. Before we go --
7 and obviously I have no issue with you
8 taking a break.

9 Jason, we're not going past 6:00.
10 So, I'm just letting you know. You can
11 call the Judge, if you want, at 6:00 p.m.

12 Can you just tell Mr. Chinchu that
13 he does not have to be on the line for
14 this? He can cut off the video and the
15 mic and we'll take the break.

16 (Recess taken.)

17 MR. LEON: Jason, I'm going to give
18 you ten more minutes to ask these
19 questions and then I'm going to do my
20 redirect.

21 MR. MIZRAHI: Are you asking for ten
22 minutes or are you demanding ten minutes?

23 MR. LEON: Neither. I just said,
24 I'm going to give you ten more minutes to
25 depose him, because you were supposed to

1 be done at 6:00. When you're done I'll
2 do very quick redirect and I'll be done.
3 That's all I'm saying.

4 MR. LEON: So, for the record it's
5 now 6:02. We're back on the record.

6 BY MR. MIZRAHI:

7 Q. Carlos, do you know what the term
8 "revenue" means?

9 MR. LEON: Objection to the form of
10 that question. You may respond.

11 THE WITNESS: Revenue?

12 Q. Yes.

13 MR. LEON: Objection to the form of
14 that question. You may respond if you
15 know.

16 THE WITNESS: No, no.

17 Q. Do you know what the building's
18 revenues were in 2015?

19 MR. LEON: Objection to the form of
20 the question. You may respond to that
21 question posed by Counsel Mizrahi.

22 THE WITNESS: No.

23 Q. Do you know what the revenues of the
24 buildings were in 2016?

25 MR. LEON: Objection to the form of

1 this question. You may respond. And I
2 would add that I believe these terms have
3 been stipulated to in this case, so it
4 sounds like a waste of time. But,
5 continue asking these.

6 THE WITNESS: No.

7 Q. Do you know what the buildings'
8 revenues were in 2017?

9 MR. LEON: Objection. Same thing.
10 Been stipulated to. But, you may respond
11 to Mr. Mizrahi's question.

12 THE WITNESS: No.

13 Q. You were a janitor at the building,
14 correct?

15 MR. LEON: Objection to the form of
16 the question and to the extent that it
17 requires my client to have legal
18 knowledge or legal expertise to answer
19 the question. You may respond if you
20 understand that question.

21 THE WITNESS: Can you repeat it?

22 Q. You refer to yourself as a janitor,
23 a superintendent; is that correct?

24 MR. LEON: Objection the form of the
25 question to the extent that it requires

1 my client to have legal expertise and
2 knowledge to respond. Subject to those
3 objections, you may respond, Mr. Chinchu.

4 THE WITNESS: As a superintendent.

5 Q. Did you do any work that required
6 you to do be physically outside of the building
7 in 2015?

8 MR. LEON: Objection to the form of
9 the question. You may respond to that
10 question.

11 THE WITNESS: Well, every year
12 during this time, March and April, he
13 would take me to his house to work on the
14 garden.

15 Q. Besides any side work that you just
16 described, did you do any work that required
17 you to be physically outside the building in
18 2015?

19 MR. LEON: Objection to those
20 improper characterizations of prior
21 testimony. You may respond to that
22 question, nevertheless.

23 THE WITNESS: Yes.

24 Q. What work?

25 A. The two houses that he has in

1 Sunnyside.

2 Q. I'm talking about the superintendent
3 services that you were describing earlier. Did
4 that require you to travel out of state?

5 MR. LEON: Objection to the form of
6 that question to the extent that it
7 requires my client to have legal
8 expertise or knowledge. You may respond
9 to Mr. Mizrahi's question.

10 THE WITNESS: No.

11 Q. Where did you get supplies from the
12 building?

13 MR. LEON: Objection to the form of
14 the question. You may respond.

15 THE WITNESS: I do not understand.

16 Q. If you ever needed supplies for the
17 building, like light bulbs, paint or any
18 supplies, where did you get the supplies from?

19 MR. LEON: Objection, asked and
20 answered. You may respond again.

21 THE WITNESS: At the hardware store.

22 Q. Where is the hardware store located?

23 A. It would depend. One was in
24 Flushing, one was on 9 -- Johns Boulevard
25 and 37, and I don't remember the other ones.

1 MR. MIZRAHI: Louis, I have no
2 further questions.

3 MR. LEON: Okay. I'll make it
4 really quick.

5 EXAMINATION

6 BY MR. LEON:

7 Q. Mr. Chinch, as you know, I'm your
8 attorney. I'm going to ask you very few
9 questions about testimony that you gave earlier
10 today. Do you understand that?

11 A. Okay.

12 Q. First off, what's my name?

13 A. Louis Leon.

14 Q. Okay. Thank you. When did you stop
15 working for the title company that you
16 mentioned earlier today?

17 A. When Patel bought the building.

18 Q. And last question. While you worked
19 for Mr. Patel did you ever work for anyone
20 else?

21 A. No.

22 MR. LEON: One moment and I think
23 that should be it. That's it.

24 I would just make one request for
25 the court reporter, it's just a

1 formality. We request the right to get a
2 copy of the transcript pursuant to the
3 Federal Rules of Civil Procedure. That
4 is a request that is necessitated. So,
5 we're just making that formal request to
6 get a copy of the transcript when it is
7 available.

8 THE REPORTER: Thank you.

9 (Time noted: 6:10 p.m.)

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A C K N O W L E D G M E N T

STATE OF)
:
COUNTY OF)

I, CARLOS CHINCHA, hereby certify
that I have read the transcript of my testimony
taken under oath in my deposition of April 23,
2020; that the transcript is a true, complete
and correct record of my testimony, and that
the answers on the record as given by me are
true and correct.

CARLOS CHINCHA

Signed and subscribed to before me
this _____ day of _____, 2020.

Notary Public, State of New York

April 23, 2020

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C E R T I F I C A T E

STATE OF NEW YORK)

: ss

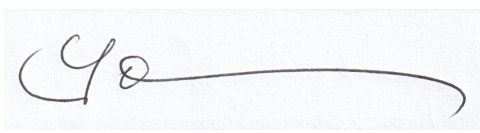
COUNTY OF NEW YORK)

I, TONI FREEMAN GREENE, a Notary
Public within and for the State of New York, do
hereby certify:

That CARLOS CHINCHA, the witness
whose deposition is hereinbefore set forth, was
duly sworn by me and that such deposition is a
true record of the testimony given by such
witness.

I further certify that I am not
related to any of the parties to this action by
blood or marriage and that I am in no way
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto
set my hand this 29th day of April, 2020.



TONI FREEMAN GREENE

April 23, 2020

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1 ***ERRATA***

2 ELLEN GRAUER COURT REPORTING CO. LLC
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5 NAME OF CASE: CARLOS CHINCHA vs. MANOJKUMAR PATEL
 6 DATE OF DEPOSITION: APRIL 23, 2020
 NAME OF WITNESS: CARLOS CHINCHA

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21 _____

22 Subscribed and sworn before me

23 this _____ day of _____, 20__.

24 _____

25 (Notary Public) My Commission Expires:

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